From: Montague, Kathryn V.

To: Odenkirchen, Edward; Sankula, Sujatha; Khan, Farugue; Radtke, Meghan; Schmid, Emily; Rowland, Grant

Cc: Kenny, Daniel

Subject: FW: Question - 2,4-D ENLIST and Dow"s contention re: tractor speed

**Date:** Wednesday, January 08, 2014 10:22:23 AM

FYI....some input from BEAD on tractor speed, per our discussion yesterday afternoon.

From: Chism, William

Sent: Wednesday, January 08, 2014 10:12 AM

To: Montague, Kathryn V.; Phillips, William; Jones, Arnet

Cc: Becker, Jonathan

Subject: RE: Question - 2,4-D ENLIST and Dow's contention re: tractor speed

## Hi Kay

The John Deer website for their big commercial sprayers lists spraying speeds of 0 to 20 mph. The slowest speed I would consider spraying 2,4-D on something like corn would be 5 mph. So, for a 1 mile long field it would take 12 minutes. So that suggests to me that they could check wind speed anywhere from every 4 to 12 minutes. Seems pretty often to me.

Let me know how much you want us to look into this. Bill

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Bill Chism

Biological and Economic Analysis Division U.S. EPA/Office of Pesticide Programs (703) 308-8136 chism.bill@epa.gov

From: Montague, Kathryn V.

Sent: Wednesday, January 08, 2014 8:34 AM
To: Chism, William; Phillips, William; Jones, Arnet

Subject: Question - 2,4-D ENLIST and Dow's contention re: tractor speed



## Good Morning,

At the last Dow meeting, which I was not able to attend, they apparently acknowledged that - surprisingly - not as many farmers as they originally thought will have the technology allowing them to adjust spraying based on real-time wind speed. However, they claim that spray decisions can still be made by having the applicator check at the beginning of each directional side of the field...and that the wind is unlikely to shift during the relatively short time the applicator is spraying along that directional edge of the field. Dow claims that the tractor will be doing 15 mph or greater, which they used to calculate the time to spray one side of a 1-mile square field being about 4 minutes. RD and EFED would like to know if 15 mph is a realistic speed for an applicator to be driving. It seems a bit fast to

me...especially for the post-emergent applications (V8-stage corn, which I understand is about 4' tall). Can any of you provide insight on whether or not Dow's assumption re: tractor speed is realistic?

Thank you,

Kay

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